

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

WILDERNESS WATCH,

Case No. 23-CV-00284 (NEB/LIB)

Plaintiff,

v.

**DECLARATION IN SUPPORT OF
MOTION FOR JUDICIAL NOTICE**

TOM HALL, Forest Supervisor of the
Superior National Forest; and UNITED
STATES FOREST SERVICE, an agency
of the U.S. Department of Agriculture,

Defendants.

I, Rachel A. Kitze Collins declare as follows:

1. I am a partner at Lockridge Grindal Nauen, P.L.L.P. (“LGN”) and am Counsel for Plaintiff in the present action. I am a member in good standing of the State Bar of Minnesota and have been admitted to this Court. I have personal knowledge of the matters set forth herein and could competently testify thereto.

2. I submit this Declaration in support of Plaintiff’s Motion for Judicial Notice.

3. Attached hereto as **Exhibit 1** is a true and correct copy of USDA, Boundary Waters Canoe Area Wilderness Trip Planning Guide (2023), *available at* <https://usfs-public.app.box.com/v/BWCAW-TripPlanner>.

4. Attached hereto as **Exhibit 2** is a true and correct copy of Tricker, Schwaller, Hanson, Mejicano, & Landres, USDA, *Mapping Wilderness Character in the Boundary Waters Canoe Area Wilderness* (April 2017), *available at* <https://usfpublic.app.box.com/s/6xs99dyvixfkdr1sqs3qvahm9m3ydtm>.

5. Attached hereto as **Exhibit 3** is a true and correct copy of Knapp & Owen, Udall Foundation, *Boundary Waters Canoe Area Wilderness Situational Assessment: Challenges and Opportunities* (June 2023), available at <https://usfs-public.app.box.com/s/6matyfcdy5dy8azllw9lhbmgiqpxa7wkx>.

I declare under penalty of perjury of the laws of the United States of America that the foregoing is true and correct.

Executed this 25th day of April, 2025 at Minneapolis, Minnesota.

By: /s/ Rachel A. Kitze Collins
Rachel A. Kitze Collins